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JUL -1 2019
U.S. District Court
Eastern District of MO

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
NORTHERN DIVISION

JANE DOE, by her next friend Anthony E.)
Rothert,)
Plaintiff,)
v.) Case No. 2:19-cv-00025-CDP
MICHELLE CHAPMAN, in her official) Currently a Sealed Matter
capacity as Circuit Clerk for Randolph County,)
Defendant.)

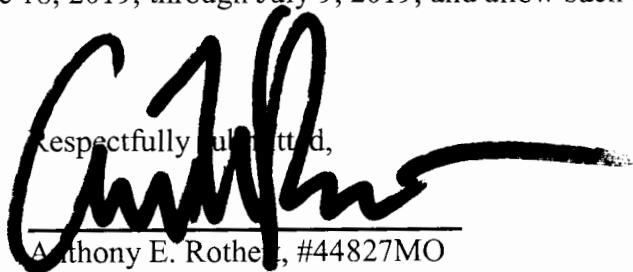
Consent Motion for Extension of Temporary Restraining Order

Pursuant to Federal Rule of Civil Procedure 65(b)(2), Plaintiff, with the consent of Defendant, requests this Court extend the temporary restraining order entered at 5:30 p.m. on June 18, 2019, from its current expiration at 5:30 p.m. on July 2, 2019, through 5:30 p.m. on July 9, 2019. In support, Plaintiff states:

1. On June 18, 2019, this Court granted an ex parte motion for temporary restraining order prohibiting Defendant and her agents and employees from disclosing Plaintiff's name or identifying information or characteristics.
2. On June 19, 2019, Defendant was personally served with the temporary restraining order as well as the complaint and summons.
3. On June 20, 2019, Plaintiff filed the proof of service.
4. Subsequent to service, Plaintiff's counsel contacted Defendant and determined that she will be represented in this case by the Missouri Attorney General.
5. Counsel for the parties are discussing the possibility of a protective order that would address the confidentiality concerns advanced by Plaintiff; however, to date, they have not reached an agreement.

6. Justin D. Smith, Deputy Attorney General for Special Litigation, Missouri Attorney General's Office, today has entered, or will enter, his appearance on behalf of Defendant.¹
7. Mr. Smith has advised undersigned counsel that Defendant will consent to a one-week extension of the temporary restraining order.
8. Good cause exists for a one-week extension. Disclosure of Plaintiff's name or identifying information would defeat the constitutional right that she seeks to vindicate in this lawsuit and is likely to cause additional harms, including the disassociation of her family and the withdrawal of her family's financial and emotional support.
9. Rule 65(b)(2) allows for extension of a temporary restraining order prior to its expiration for good cause.

WHEREFORE Plaintiff requests that, because of good cause shown, this Court extend the temporary restraining order entered on June 18, 2019, through July 9, 2019, and allow such other and further relief as is appropriate.



Respectfully submitted,

Anthony E. Rother, #44827MO
Jessie Steffan, #64861MO
ACLU of Missouri Foundation
906 Olive Street, Suite 1130
St. Louis, Missouri 63101
Phone: (314) 669-3420

Gillian R. Wilcox, #61278MO
ACLU of Missouri Foundation
406 West 34th Street, Ste. 420
Kansas City, MO 64111
Phone: (314) 652-3114

¹ Because this matter is currently sealed, Mr. Smith's entry of appearance and this motion must be filed in person. Thus, counsel for Plaintiff does not know whether Mr. Smith's appearance has yet been filed.